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March 28, 2022

The Honorable Mary Kay Vyskocil
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Penske Media Corp. v. Shutterstock, Inc.*, 20-cv-4583 (MKV)

Dear Judge Vyskocil:

We represent Plaintiff Penske Media Corporation (“PMC”) in the above-captioned matter and, pursuant to this Court’s Individual Rule 9.B, we write to request leave to file under seal portions of PMC’s letter responding to the request by Shutterstock, Inc. (“Shutterstock”) for a pre-motion conference concerning Shutterstock’s contemplated motion for summary judgment, and the accompanying response to Shutterstock’s Rule 56.1 statement. PMC seeks this relief because the letter and Rule 56.1 statement embody documents designated “Confidential” or “Attorneys’ Eyes Only” under the Stipulated Protective Order, dated July 12, 2021. (Dkt. 72). Pursuant to Rules 9.B(i)-(ii), unredacted versions of these documents are contemporaneously being filed under seal and emailed to chambers.

Sincerely,

/s/ Cynthia S. Arato